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Attorneys for Plaintiff HOANG MINH LE

CENTRAL DISTRICT OF CALIFORNIA

HOANG MINH LE, an individual,

Plaintiff,

vs.

UPLAND RAJCIC BROTHERS, LLC, a
limited liability company;

Defendants.

Case No.: 5:22-cv-01400-JGB-SP

**PLAINTIFF'S NOTICE OF
VOLUNTARY DISMISSAL OF
ENTIRE ACTION WITH
PREJUDICE PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 41(a)(1)**

[Assigned to Hon. Jesus G. Bernal]

1 **PLEASE TAKE NOTICE** that Plaintiff Hoang Minh Le (“Plaintiff”) pursuant to
2 Federal Rule of Civil Procedure Rule 41(a)(1), hereby voluntarily dismisses the entire
3 action *with prejudice* pursuant to Federal Rule of Civil Procedure Rule 41(a)(1)
4 which provides in relevant part:

5 **(a) Voluntary Dismissal.**

6 (1) By the Plaintiff.

7 (A) *Without a Court Order.* Subject to Rules 23(e), 23.1(c), 23.2, and
8 66 and any applicable federal statute, the plaintiff may dismiss an
9 action without a court order by filing:

10 (i) A notice of dismissal before the opposing party serves either
11 an answer or a motion for summary judgment.
12

13 Defendant UPLAND RAJCIC BROTHERS, LLC, a limited liability company
14 (“Defendant”) has neither answered Plaintiff’s Complaint, nor filed a motion for
15 summary judgment. Accordingly, Defendant may be dismissed with prejudice and
16 without an Order of the Court.

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18 ASCENSION LAW GROUP, PC

19 DATE: December 22, 2022

20 /s/ Pamela Tsao

21 Pamela Tsao, attorney for Plaintiff

22 Hoang Minh Le
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